

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 22-10943 (MEW)  
)  
) (Jointly Administered)  
)

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**FIRST SUPPLEMENTAL DECLARATION OF DISINTERESTEDNESS  
OF DAY PITNEY LLP PURSUANT TO THE ORDER  
AUTHORIZING THE RETENTION AND COMPENSATION OF  
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

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I, Richard D. Harris, declare under penalty of perjury:

1. I am a partner of Day Pitney LLP, located at 242 Trumbull Street, Hartford, Connecticut 06103 (the “Firm”).

2. Voyager Digital Holdings, Inc. and the other above-captioned debtors and debtors in possession (collectively, the “Debtors”), previously requested that the Firm provide legal services to the Debtors, and the Firm has consented to provide such services.

3. I previously submitted a Declaration of Disinterestedness in connection with the services provided to the Debtors, docketed at ECF No. 427.

4. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to these chapter 11 cases for persons that are parties in interest in the Debtors’ chapter 11 cases. Except as otherwise disclosed herein and in my previous Declaration of Disinterestedness, the Firm does not perform services for any

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

such person in connection with these chapter 11 cases, or have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

5. The Firm is representing Steve Ehrlich, Chief Executive Officer, and Co-Founder of Voyager Digital Ltd., in his individual capacity, in connection with the Debtors' chapter 11 cases (the "Bankruptcy Matters") and the class action litigation entitled Robertson et al. v. Cuban et al., No. 1:22-cv-22538-RKA (S.D. Fla. Aug. 10, 2022) (the "Class Action Matter"). The Firm's representation of Mr. Ehrlich as described above is unrelated to the matters upon which the Firm is employed by the Debtors. I do not believe that the Firm's current representation of Mr. Ehrlich in the Bankruptcy Matters and the Class Action Matter precludes the Firm from meeting the disinterestedness standard under the Bankruptcy Code.

6. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these chapter 11 cases.

7. During the period of its employment, if I or the Firm should discover any facts bearing on the matters described herein, I will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: October 17, 2022



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Richard D. Harris